Molluscs grazing on wild feed is no different to:

- Sheep and Cattle eating grass not grown in a sealed environment
- Chickens creating wonderful organic eggs by eating seeds and grubs and grass not grown in a sealed environment.
- Bees collecting nectar not grown in a sealed environment
- Seaweed filtering nutrients in the open sea,

In the three examples above what is important is the governance of the wildlot: the farmer monitors and knows the inputs. And are all of the above are marketed with a USDA Organic standard and Seal as a result?

Interestingly 'free-range chicken eggs' the epitome of organic goodness is a bit of an oxymoron in the context of an argument against any 'wild' inputs.

In the case of Sealord they monitor both the water column itself and the mussels with a scientifically robust proscribed sampling protocol that means they know, to a level that satisfies two highly credible members of IFOAM, what comes in and out of the water column.

Sealord had been monitoring the columns at the farm sites for 8 years before applying for Organic Certification. We know that's not practical for a system: but we also know that applying the land-based model of 2 years testing would work equally well for water in a coastal seasystem. They also have arrangements with adjacent land and water owners/users that protects the integrity of the system: in the same way that an organic vineyard owner has spray drift protocols with non-organic vineyards adjacent.

It has to be stressed that we here in New Zealand fully understand the issues AND we found a solution that has integrity AND is being accepted by major retailers (and their consumers) in the USA and the UK and we are more than willing to share that with NOAWG to help resolve your 'sticky issues'; and have offered to do so.

So sorry, but I remain very sorry about the situation.

Bill Floyd Floyd Marketing Ltd

312 Scott Street Blenheim New Zealand tel 64 3 578 2706 fax 64 3 577 8429 email floydmarketing@xtra.co.nz

-----Original Message-----

From: GSLockCVCA@aol.com [mailto:GSLockCVCA@aol.com]

Sent: 07 October 2006 04:34 To: floydmarketing@xtra.co.nz

Cc: ecotruchas@hotmail.com; jhargreaves01@yahoo.com

Subject: organic mollusc standards

Bill,

Richard Nelson has passed on your comments including that "I'm very sorry that NOAWG came to an impasse on organic aquaculture standards for molluscs..."

Please be advised that the Aquaculture Working Group of our NOSB is presently still working on a proposal. There are many sticky issues involved, not the least of which is that bivalve molluscs graze on wild feed, which is a major problem with the organic community here in the United States.

It is nice to hear from you.

George

George S. Lockwood PO Box 345 8 El Robledo Carmel Valley, CA 93924 Tel: 831-659-4145 Fax: 831-659-4144 Cell: 831-601-6761